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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES EXCHANGE COMMISSION ,

Plaintiff,

vs.

VICTOR ALFAYA, et al

Defendant's

Civil action No. 14-7575

Judge Denise Cote

JURY TRIAL DEMANDED

Answer of Defendant Victor Alfaya

Victor Alfaya, pro se, for his answer to the complaint for civil damages and other relief, states:

1. Defendant denies each and every allegation contained in the Amended Complaint except as expressly admitted or otherwise specifically responded below.

SUMMARY OF ALLEGATIONS IN COMPLAINT

1 – 6

Denies.

VIOLATIONS

7(a) and (b)

Denies.

7(c), 7(d) and 7(e)

Denies.

7(f), 7(g), 7(h)

Denies.

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1 NATURE OF PROCEEDINGS

2 8 Denies for want of knowledge.

3 9 Denies for want of knowledge.

4 10 Denies for want of knowledge.

5 11 Denies for want of knowledge.

6
7
8
9 DEFENDANTS

10
11
12 12 - 21 Denies for want of knowledge.

13 22 Admits that I am 37 and reside in Port
14 Washington, New York. Admits that
15 I was never a registered with the SEC.
16 Admits that I worked for Small Cap
17 Resources Corp. Admits that I worked for
18 SCR for the years stated.

19 23 - 32 Denies for want of knowledge.

20
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24 FACTS

25
26
27 **I. The Fraudulent Issuers and Related Entities**

28
29 **A. The Fraudulent Issuers**

30
31 33 - 38 DENIES FOR WANT OF KNOWLEDGE.

32
⊗

B. RELATED ENTITIES

39 – 42 Denies for want of knowledge.

II. A. Lenco Mobile Inc.

1. Background

44 - 46 Denies for want of knowledge.

2. The Undisclosed Commission Scheme

47 - 49 Denies for want of knowledge.

3. The Illegal Brokerage of Lenco Stock

50 – 54 Denies for want of knowledge.

B. Kensington Leasing LTD. and Wikifamilies, Inc.

1. Background

55 – 59 Denies for want of knowledge.

2. Goldstein and Engelbrecht's Illegally Matched Trades

60 – 62 Denies for want of knowledge.

4. De Maison Illegally Acted as an Unregistered Broker-Dealer.

63 - 66 Denies for want of knowledge.

C. Casablanca Mining Ltd.

1. Background

67 – 70 Denies for want of knowledge.

2. Cope, Kuhn etc.

71 – 75 Denies for want of knowledge.

3. De Maison Illegally Acted as an Unregistered Broker - Dealer

76 – 77 Denies for want of knowledge.

3. Cope Matched Trades with SCR Customers etc.

78 – 82 Denies for want of knowledge.

D. Lustros, Inc.

1 1. Background

2
3 83 – 84 Denies for want of knowledge.
4
5

6 2. Engelbrecht Paid Kuhn etc.
7

8 85 – 87 Denies for want of knowledge.
9
10

11 88 Admit that I was paid some amount of monies
12 In 2012, but deny that the amounts stated are
13 Correct and/ or that all such monies represented
14 Commissions and that any commissions paid were
15 undisclosed. Deny all other allegations for want
16 of knowledge.
17
18

19 4. Kuhn Consistently Sold His Own Lustros Stock etc.
20

21 89 – 95 Denies for want of knowledge.
22
23

24 **E. Gepco, Inc.**
25

26 1. Background
27

28
29 96 – 100 Denies for want of knowledge.
30
31

32 2. Engelbrecht and Malone etc.

101– 115 Denies for want of knowledge.

3. Engelbrecht, Kuhn etc.

116 – 121 Denies for want of knowledge.

4. Engelbrecht and De Maison

122– 129 Denies for want of knowledge.

5. Engelbrecht and Voutsas etc.

130 – 134 Denies for want of knowledge.

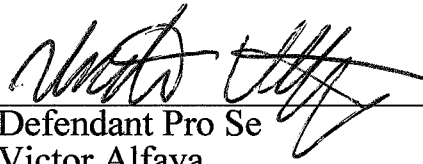
6. Engelbrecht Caused etc.

135 – 138 Denies for want of knowledge.

1. AFFIRMATIVE DEFENSE

Defendant's right to defend himself under federal law in the present case is greatly infringed upon due to the pending criminal case in Cleveland Ohio in which Defendant has a constitutional right to remain silent.

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13 Dated this 13 Day of January, 2016

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15 
16 Defendant Pro Se
17 Victor Alfaya
18 32 Linwood Rd south
19 Port Washington NY 11050
20 Valfaya@aol.com
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32

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2016, a copy of the Answer of Defendant Victor Alfaya to the amended complaint was delivered via regular U.S. mail and email to the following:

1. Howard Fischer
Senior Trial Counsel
Securities & Exchange Commission
Brookfield Place, 200 Vesey Street
Room 17-216
New York, NY 10281.
Tel: (212) 336-0589
Cell: (917) 226-1943
Fax: (703) 813-9490
FischerH@SEC.gov

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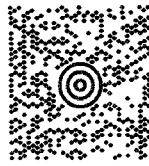
VICTOR ALFAYA
 15161 633-3343
 THE UPS STORE #3217
 5800 RIVER RD
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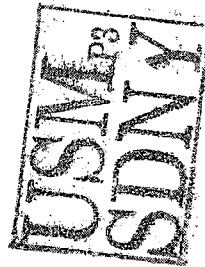
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